

U.S. Department of Justice

United States Attorney Southern District of New York

The Silvio J. Mollo Building One Saint Andrew's Plaza New York, New York 10007

March 27, 2020

VIA ECF

The Honorable Andrew L. Carter, Jr. United States District Judge Southern District of New York United States Courthouse 40 Foley Square New York, New York 10007

MEMO ENDORSED

USDC SDNY
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DATE FILED: 3/30/20

Re: <u>United States v. Recio-Rondon, et al.</u>,

20 Cr. 115 (ALC)

Dear Judge Carter:

The Government writes to respectfully request an adjournment of the parties' upcoming conference in the above-captioned matter, currently scheduled for April 3, 2020 at 12:30 p.m.

As stated to the Court in the Government's March 13, 2020 letter regarding discovery, the Government is in the process of reviewing and producing discovery in this matter, consisting of two cellular telephones containing approximately 20 gigabytes of data. The Government has consulted with defense counsel, who have indicated that they require additional time to contemplate motions and a briefing schedule in this matter.

Accordingly, and in light of the District Court's Standing Order, M10-468, 20 Misc. 154, the Government respectfully requests that the Court adjourn the April 3, 2020 conference *sine die*, and that, as an alternative, the parties provide the Court a letter-update on or before April 15, 2020 proposing a briefing schedule or a date for the next scheduled conference. The Government further requests that time be excluded under the Speedy Trial Act from today's date up to April 15, 2020 to facilitate the production and review of discovery, and any discussions regarding pretrial motions. The Government has conferred with defense counsel, who consent to this request.

[Continued]

Wherefore, the Government respectfully requests that the April 3, 2020 conference be adjourned *sine die*, that the parties submit a letter on April 15, 2020 with a proposed conference date or briefing schedule, and that time be excluded up to April 15, 2020.

Respectfully submitted,

GEOFFREY S. BERMAN United States Attorney for the Southern District of New York

By: ____/s/_____

Sarah Mortazavi Jacob Gutwillig Assistant United States Attorneys (212) 637-2520/2215

cc: All Counsel via ECF

HON, ANDREW L. CARTER, JR. UNITED STATES DISTRICT JUDGE

3/30/20